UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

Olga Martinez Torres, Linda Davis, Angel Alberio and Fernando Posso, on behalf of themselves and all others similarly situated,

Plaintiffs,

VS.

American Airlines, Inc., the Employee Benefits Committee and John/Jane Does 1-5

Defendant.

Civil Action No.: 4:18-cv-00983-O

JOINT NOTICE OF SETTLEMENT

The Parties to this litigation have reached an agreement for settlement of the case. They are finalizing the necessary paperwork and anticipate completing the process very shortly. The Parties respectfully request that the Court stay and take no action in this case prior to July 10, 2020 to give the Parties time to finalize the Settlement and procure the necessary signatures.

Respectfully submitted,

/s/ Joe Kendall

Joe Kendall Texas Bar. No. 11260700

KENDALL LAW GROUP, PLLC

3811 Turtle Creek Blvd., Suite 1450 Dallas, Texas 75219 (213) 744-3000 / (214) 744-3105 (Facsimile)

jkendall@kendalllawgroup.com

/s/ Lars L. Berg

Dee J. Kelly, Jr. (S.B. # 11217250)

Lars L. Berg (S.B. # 00787072)

KELLY HART & HALLMAN LLP

201 Main Street, Suite 2500

Fort Worth, Texas 76102 Tel.: (817) 332-2500

Fax: (817) 878-9280

dee.kelly.2@kellyhart.com

lars.berg@kellyhart.com

Robert A. Izard (pro hac vice) Seth R. Klein (pro hac vice) Mark P. Kindall (pro hac vice) Douglas P. Needham (pro hac vice)

IZARD, KINDALL & RAABE LLP

29 South Main Street, Suite 305 West Hartford, CT 06107

Tel: (860) 493-6292 Fax: (860) 493-6290

Email: rizard@ikrlaw.com Email: sklein@ikrlaw.com Email: mkindall@ikrlaw.com Email: dneedham@ikrlaw.com

Gregory Y. Porter (to be admitted *pro hac vice*) Mark G. Boyko (to be admitted *pro hac vice*) **BAILEY & GLASSER LLP** 1054 31st Street, NW, Suite 230 Washington, DC 20007

(202) 463-2101 (202) 463-2103 fax gporter@baileyglasser.com mboyko@baileyglasser.com

Counsel for Plaintiffs

Mark W. Robertson (pro hac vice)

(N.Y. Bar # 4508248)

O'MELVENY & MYERS LLP

7 Times Square

New York, NY 10036 Tel.: (212) 326-2000 Fax: (212) 326-2061 mrobertson@omm.com

Shannon M. Barrett (pro hac vice)

(D.C. Bar # 476866)

O'MELVENY & MYERS LLP

1625 Eye Street, N.W. Washington, D.C. 20006 Tel.: (202) 383-5300 Fax: (202) 383-5300 sbarrett@omm.com

Wayne Jacobsen (pro hac vice)

(Cal. Bar # 106824)

O'MELVENY & MYERS LLP

610 Newport Center Drive, 17th Floor

Newport Beach, CA 92660

Tel.: (949) 823-6900 Fax: (949) 823-6994 wjacobson@omm.com

Counsel for Defendants American Airlines, Inc. and the Employee Benefits Committee

CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(b), the undersigned counsel certifies that the Joint Notice of Settlement is presented jointly by all Parties. The Motion is unopposed.

/s/ Mark P. Kindall
MARK P. KINDALL

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed with the Court's electronic case filing (ECF) system on July 1, 2020, which caused an electronic copy of this document to be served on all counsel of record in this matter who have registered for ECF service.

/s/ Joe Kendall Joe Kendall